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August 26, 2022

VIA ECF

Honorable Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Payamps v. City of New York et al.
22-CV-0563 (AMD) (VMS)

Your Honor:

I am a Senior Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants City of New York (“City”), Mayor Bill de Blasio, New York City Police Commissioner Dermot Shea, New York City Police Department (“NYPD”) Chief of Department Terence Monahan, Police Officer Daniel Auguste, and Police Officer Corey Johnson (collectively “Defendants”) in the above-referenced matter. Defendants write to respectfully request an enlargement of time, from August 26, 2022 to September 2, 2022 to file the City’s answer to Defendant Lance’s crossclaim. This is Defendants’ second request for such an enlargement. Defendant Lance consents to this request.

The undersigned was recently on trial before the Honorable Rachel P. Kovner in the Eastern District of New York. The trial began on Wednesday, August 17, 2022 and concluded this past Tuesday, August 23, 2022. As a result of this trial schedule, the undersigned has been unable to finalize a response to Defendant Lance’s crossclaim. The additional seven-day enlargement to September 2, 2022 will afford defendant City the time needed to submit its response.

In light of the foregoing, Defendants’ respectfully request an enlargement of time, from August 26, 2022 to September 2, 2022 to file Defendants’ answer to Defendant Lance’s crossclaim.

Defendants thank the Court for its time and consideration of this request.

By: /s/
Michael Pesin-Virovets
Senior Counsel

cc:

By ECF

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